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1	BRADLEY S. MAINOR, ESQ.
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3	Nevada Bar No. 10280 ASH MARIE GANIER, ESQ.
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7	Fax: (702) 463-4440
8	ash@mwinjury.com Counsel for Plaintiff
9	UNIT
10	
11	JACKIE HAWKINS, individually,
12	Plaintiff,
	Plaintiff, vs.
12 13 14	vs.
13	vs. UNITED STATES OF AMERICA,
13	vs.
13 14 15	vs. UNITED STATES OF AMERICA, Defendant.
13 14 15 16	vs. UNITED STATES OF AMERICA,

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CASE NO.:

STIPULATION FOR EXTENSION OF MOTION DEADLINES (FIRST REQUEST)

2:17-cv-02994-MMD-NJK

Plaintiff, JACKIE HAWKINS, by and through her counsel of record, BRADLEY S. MAINOR, ESQ., JOSEPH J. WIRTH, ESQ. and ASH MARIE GANIER, ESQ., of MAINOR WIRTH, LLP, and Defendant UNITED STATES OF AMERICA, by and through its counsel of record, BRIAN IRVIN, ESQ., of the UNITED STATES ATTORNEY'S OFFICE, DISTRICT OF NEVADA, hereby submit the following STIPULATION FOR EXTENSION OF MOTION DEADLINES (First Request).

The Parties have stipulated to extend the deadline for Plaintiff to file her Opposition to Defendant's Motion for Summary Judgement (ECF NO. 37) by fourteen (14) days. Furthermore, the Parties have stipulated to extend the deadline for Defendant to Reply in Support of the Motion to Limit Damages (ECF NO. 38) by fourteen (14) days.

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A. REASONS WHY DEADLINES HAVE NOT BEEN COMPLETED

The Parties have stipulated in good faith to a brief 14-day extension of the current motion deadlines, as described above, due to conflicts that have risen in their schedules. Specifically, the Parties have coinciding deadlines and/or hearings in other matters. Plaintiff's counsel is also traveling out of state for the upcoming Labor Day Weekend. Furthermore, the Motions presently on file call for dismissal of Plaintiff's entire claim and a reduction of her damages, so that additional time is warranted to properly brief the issues therein.

B. PROPOSED OPPOSITION AND REPLY DEADLINES

Opposition to Motion for Summary Judgement: September 16, 2019

Reply in Support of the Motion to Limit Damages: September 16, 2019

DATED this 29th day of August, 2019.

DATED this 29th day of August, 2019.

MAINOR WIRTH, LLP

/s/ Ash Marie Ganier

UNITED STATES ATTORNEY'S OFFICE DISTRICT OF NEVADA

/s/ Brian W. Irvin

BRADLEY S. MAINOR, ESQ. Nevada Bar No. 7434 JOSEPH J. WIRTH, ESQ. Nevada Bar No. 10280 ASH MARIE GANIER, ESQ. Nevada Bar No. 14712 6018 S. Fort Apache Road, Ste. 150 Las Vegas, NV 89148-5652 Counsel for Plaintiff

BRIAN W. IRVIN, ESQ. Nevada Bar No. 7758 501 Las Vegas Boulevard South, Ste. 1100 Las Vegas, NV 89101 Attorney for Defendant

IT IS SO ORDERED.

Dated this 29th day of August, 2019.

UNITED STATES DISTRICT COURT JUDGE